

ORIGINAL

DIVISION OF CONSUMER ADVOCACY  
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FILED  
2010 MAR -8 P 3:33  
PUBLIC UTILITIES  
COMMISSION

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

In the Matter of the Application of )  
PUBLIC UTILITIES COMMISSION )  
Instituting a Proceeding to Investigate the )  
Implementation of Feed-in Tariffs. )

DOCKET NO. 2008-0273

**DIVISION OF CONSUMER ADVOCACY'S**  
**COMMENTS ON QUEUING AND INTERCONNECTION PROCEDURES**

Pursuant to the Order Setting Schedule filed on October 29, 2009, as amended by the Commission's February 17, 2010 letter and HECO Companies'<sup>1</sup> request for a subsequent extension filed February 23, 2010, the Division of Consumer Advocacy ("Consumer Advocate") hereby submits the following comments on the Queuing and Interconnection Procedures.

**I. COMMENTS.**

On February 1, 2010, the HECO Companies filed its report on the "Development of Feed-in Tariff Queuing and Interconnection Procedures and Proposal of Initial

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<sup>1</sup> The Hawaiian Electric Companies include Hawaiian Electric Company, Inc., Maui Electric Company Limited, and Hawaii Electric Light Company, Inc.

Implementation," prepared by Merrimack Energy Group, Inc. ("Proposed Q&I Procedures"). Furthermore, on February 1, 2010, Clean Energy Maui LLC and Zero Emissions Leasing LLC, jointly, filed proposed queuing and interconnection procedures.

The Consumer Advocate notes that its comments are primarily focused on the HECO Companies' Proposed Q&I Procedures and are not comprehensive.

In general, the Consumer Advocate notes that the Proposed Q&I Procedures appear to be consistent with the Commission's Decision and Order filed September 25, 2009 as it sets forth procedures that "include project development milestones to advance in the queue and deposits for applicants," "a mechanism for applicants to apply for extensions," "procedures [that] should mitigate the added risks associated with required deposits but maintain the incentive for only viable projects to apply for interconnection studies," and "[a]n independent third party. . . [who will] oversee the queuing process for FIT projects." The Consumer Advocate also observes that it appears that the Proposed Q&I Procedures appears to be a "work in progress" as the HECO Companies recognize that several issues need to be addressed. Such issues which appear to be in development by the HECO Companies with the Independent Observer ("IO") are: (1) establishing the order and priority that will be applied by HECO Companies to the various contracting mechanisms;<sup>2</sup> (2) the standardized application form and detailed comprehensive checklist that an application must meet to be deemed complete;<sup>3</sup> (3) the mechanism or conditions for applicants to apply for extensions for the amount of time needed to meet project development milestones prior to being dropped from the

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<sup>2</sup> HECO Companies' Response to CA/HECO-IR-1.

<sup>3</sup> HECO Companies' Response to CA/HECO-IR-4.

queue,<sup>4</sup> and (4) the type of project information that will be posted on the FIT website.<sup>5</sup> The Consumer Advocate further recognizes that other issues raised by the other parties' comments in the instant proceeding will need to be considered.

As such, it does not appear that the Proposed Q&I Procedures are unreasonable at this time. The Consumer Advocate anticipates that the HECO Companies and/or IO will review comments by the parties for discussion and consideration in the technical workshop being proposed by the IO.<sup>6</sup>

DATED: Honolulu, Hawaii, March 8, 2010.

Respectfully submitted,

By   
JON S. ITOMURA  
Supervising Attorney

DIVISION OF CONSUMER ADVOCACY

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<sup>4</sup> HECO Companies' Response to DBEDT/HECO-IR-3(f).

<sup>5</sup> HECO Companies' Response to HREA-IR-2.

<sup>6</sup> Email from HECO Companies dated March 8, 2010.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **DIVISION OF CONSUMER ADVOCACY'S COMMENTS ON QUEUING AND INTERCONNECTION PROCEDURES** was duly served upon the following parties, by personal service, hand delivery, and/or U.S. mail, postage prepaid, and properly addressed pursuant to HAR § 6-61-21(d).

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